

**TAB 6**

**Bremen Affidavit**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

ABIGAIL NOEL FISHER, and  
RACHEL MULTER MICHALEWICZ,  
*Plaintiffs,*

v.

UNIVERSITY OF TEXAS AT AUSTIN,  
et al.,  
*Defendants.*

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**CIVIL ACTION NO. 1:08-CV-00263-SS**

**AFFIDAVIT OF BRIAN A. BREMEN**

**THE STATE OF TEXAS**

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**COUNTY OF TRAVIS**

BEFORE ME, the undersigned authority, personally appeared Brian A. Bremen, who, being by me duly sworn, upon his oath stated:

1. My name is Brian A. Bremen. I am over 18 years of age, of sound mind, capable of making this affidavit, and personally acquainted with the facts stated in it. I make this affidavit in support of Defendants' Motion for Summary Judgment and in opposition to Plaintiffs' Motion for Summary Judgment. .

2. I am an Associate Professor of English at the University of Texas at Austin. I serve, however, as a consultant to the Admissions Office, providing training to its essay readers and its admissions staff who conduct full file reviews. I have been involved with the University in this capacity since 1997.


3. I have also served as a consultant for the College Board for approximately 30 years now. I served as the Chair of the Test Development Committee for the SAT II writing test, I was a chief reader for the SAT II writing test, and was a member of the SAT Writing Test Development Committee when the SAT II writing test was suspended and that test then became part of the overall SAT battery. I have also served as a special consultant for the College Board once the SAT writing test was administered where I would fly up to Iowa City every time there was an administration of the SAT to set up the scoring and training procedures for that test.

4. The process the University uses for evaluating essays and full files is the same process used at the College Board for evaluating essays. It is a process known as holistic scoring, which was developed in the 1960s and has been in wide use for at least 30 years.

5. I conduct the training of the essay readers and the full file readers for the University, as I explained in my deposition.

6. With respect to the training of essay readers, I provide the readers a scoring guide that describes typical characteristics of essays with particular scores. A true and correct copy of the scoring guide used in the admissions process for the 2008 freshman class is attached as Exhibit A. Readers also leave training with a set of "range finders," which are samples to which they can refer to assist them in assigning a particular score to a particular essay.

7. Since UT Austin takes its process so seriously, I have also, from time to time, compared readers' scores with my assigned score, to ensure consistency. The last time I undertook such a comprehensive review was 2007. I found nothing that raised concerns. Had I found that any readers seemed off the mark, I would have reported it to the admissions staff and suggested additional training for the reader(s) in question.

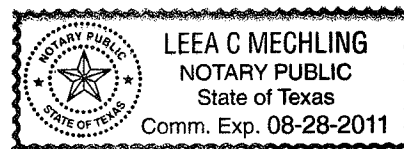


Brian A. Bremen

SUBSCRIBED AND SWORN TO BEFORE ME on the 23<sup>rd</sup> day of February 2009, to certify which witness my hand and official seal.



Notary Public in and for the State of Texas



**Brian A. Bremen Affidavit**

**Exhibit A**

## Holistic Scoring

1. Read quickly for an impression of the whole essay and score immediately; do not reread or analyze and do not let the scoring guide become a crutch. Use the standards you have internalized from the range finders.
2. Read the entire essay; the writing sometimes improves dramatically as the writer goes on.
3. Read supportively; look for and reward what is done well, rather than what has been done badly or omitted.
4. Take everything in the essay into account: organization, spelling, diction, sentence structure—everything.
5. Do not judge an essay by its length; some short responses are good and some long essays are atrocious.
6. Remember that an essay that uses a particular kind of example (religious intolerance or an English class) is not inherently better than a paper that uses examples that seem to be minor or inconsequential (overcoming an aversion to chocolate ice cream or basketweaving).
7. Use the full scale; since essays are ranked against each other and not against an ideal, there are “6” essays and there are “1s.” A “6” essay need not be perfect.
8. Remember that each score category represents a range—there are high 3s, middle 2s, and low 5s.
9. Remember that standards are set by consensus and that individual readers are expected to accept and follow those standards.
10. Remember that, to the writer of the essay, the ideas expressed are fresh and original. Unlike the reader, the writer hasn’t seen 300 essays that claim that Biology II changed the student’s life forever.

## Scoring Guide

### Score of 6

An essay in this category demonstrates clear and consistent competence though it may have occasional errors. Such an essay:

- effectively and insightfully addresses the writing task
- is well organized and fully developed, using clearly appropriate examples to support ideas
- displays consistent facility in the use of language, demonstrating variety in sentence structure and range of vocabulary

### Score of 5

An essay in this category demonstrates reasonably consistent competence though it will have occasional errors or lapses in quality. Such an essay:

- effectively addresses the writing task
- is generally well organized and adequately developed, using appropriate examples to support ideas
- displays facility in the use of language, demonstrating some syntactic variety and range of vocabulary

### Score of 4

An essay in this category demonstrates adequate competence with occasional errors and lapses in quality. Such an essay:

- addresses the writing task
- is organized and somewhat developed, using examples to support ideas
- presents minimal sentence variety

### Score of 3

An essay in this category demonstrates developing competence. Such an essay may contain one or more of the following weaknesses:

- inadequate organization or development
- inappropriate or insufficient details to support ideas
- an accumulation of awkward expressions

### Score of 2

An essay in this category demonstrates some incompetence. Such an essay is flawed by one or more of the following weaknesses:

- poor organization
- thin development
- little or inappropriate details to support ideas
- frequent awkward expressions

### Score of 1

An essay in this category demonstrates incompetence. Such an essay is seriously flawed by one or more of the following weaknesses:

- very poor organization
- very thin development
- expressions so awkward that meaning is somewhat obscured